

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ENAN HARVEY,

Plaintiff,

v.

**PORTFOLIO RECOVERY
ASSOCIATES, LLC,**

Defendant.

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CASE NO. 2:21-CV-00950

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from the Magisterial District Court for Delaware County, No. 32-2-40, and in support thereof avers as follows:

1. Portfolio Recovery Associates, LLC is a defendant in a civil action originally filed on or about January 25, 2021 in the Magisterial District Court for Delaware County, No. 32-2-40, titled *Enan Harvey v. Portfolio Recovery Associates, LLC* and docketed to Case No. MF-32240-CV-00000005-2021.

2. The removal is timely under 28 U.S.C. § 1446(b). PRA received service of Plaintiff's Complaint by certified mail on February 1, 2021.

3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all pleadings, process and orders filed in the state court action.

4. The District Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against PRA alleging violations of the Fair Debt Collection

Practices Act, 15 U.S.C. § 1692, *et seq.* and the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.*

5. On this date, PRA has provided notice of this Removal to Plaintiff and to the Honorable Steven A. Sandone, Magistrate Judge for MDJ-32-2-40, Delaware County.

WHEREFORE, Defendant Portfolio Recovery Associates, LLC respectfully removes this case to the United States District for the Eastern District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: March 1, 2021

CERTIFICATE OF SERVICE

I certify that on March 1, 2021, a true copy of the foregoing document was served as follows:

Via U.S. Mail, Postage Prepaid
Enan Harvey
524 Primros Ave.
Folcroft, PA 19032
Plaintiff

Via Facsimile to (610) 583-1197 and U.S.
Mail, Postage Prepaid
Magisterial District Court 32-2-40
Hon. Steven A. Sandone
11 Bartram Ave.
Glenolden, PA 19036

MESSER STRICKLER, LTD.

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Counsel for Defendant

Dated: March 1, 2021